IN THE UNITED STATE DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Asbestos Products Liability Litigation (No. VI); MDL 875

Regarding:

IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF ALABAMA

GRADY O. HUMPHREYS, et al.,

Plaintiffs,

Civil Action No. 07-CV-607-WKW VS.

A. O. SMITH ELECTRICAL PRODUCTS COMPANY, a division of A. O. SMITH CORPORATION, et al.,

Defendants.

DEFENDANT RAPID AMERICAN CORPORATION'S JOINDER IN SUNBEAM PRODUCTS INCORPORATED'S MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION TO SEVER AND FOR MORE DEFINITE STATEMENT AND SUPPORTING MEMORANDUM OF LAW

Defendant, Rapid American Corporation, by and through its attorney of record, hereby joins in and adopts by reference as if set forth fully herein, the Motion to Dismiss, or In the Alternative, Motion to Sever and for More Definite Statement and Supporting Memorandum of Law filed by Defendant Sunbeam Products Incorporated (Doc. 267) on April 30, 2008. In filing this joinder, Rapid American Corporation does not in any way waive any grounds set forth in its previously filed Motion to Dismiss.

Wherefore, the premises considered, Defendant Rapid American Corporation prays that Sunbeam Products Incorporated's Motion to Dismiss, or In the Alternative, Motion to Sever and for More Definite Statement and Supporting Memorandum of Law be granted.

> /s/ E. L. McCafferty, III E. L. McCAFFERTY, III (ASB-6710-C64E) Attorney for Rapid American Corporation

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have on this 26th day of June, 2008, served a copy of the foregoing by electronic means via the CM/ECF to those registered with the CM/ECF.

/s/ E. L. McCafferty, III